

INTERAGENCY STAFF COMMITTEE RECOMMENDATION
COMMUNITIES AND AREAS PROPOSED FOR FURTHER ANALYSIS IN THE
DECENNIAL REVIEW OF RURAL DETERMINATIONS

The recommendations of the Interagency Staff Committee are summarized in the attached Tables 1 and 2, and described in more detail in this narrative.

Majority Recommendation

The majority of the ISC recommends that the Federal Subsistence Board approve for further analysis the ten communities and areas proposed by the Board on July 18, 2005, with the addition of an evaluation of the rural/non-rural characteristics of the Ketchikan Area and of Prudhoe Bay. The majority believes these communities should be advanced for further analysis, rather than limiting further review. If these communities do not warrant a change in status, this should be determined through a full analysis and Board consideration.

The initial review of the rural/nonrural status of all Alaska communities provided a well-reasoned and substantial assessment of communities/areas warranting further analysis. That assessment formed the basis for the Board's proposed list of communities/areas to undergo additional analysis which was made available for public and Council review and comment. The majority of the ISC did not find persuasive the rationale for the exclusion of some of the proposed communities from further analysis as recommended in some of the public and Council comments. The information provided was not sufficient to contradict the initial assessment. Under criteria in Federal subsistence regulations, communities with populations greater than 7,000 are presumed to be nonrural unless they possess significant characteristics of a rural nature. There has not been an analytic review of community characteristics of the listed rural communities by the Federal Subsistence Management Program since 1990. Despite assertions by residents of these communities that the rural characteristics of their communities have not changed since 1990, the Board needs to have an analytic review of current community characteristics before a determination is made to retain or change the rural designation of these communities.

All ISC members support the addition of the Ketchikan Area and Prudhoe Bay to the communities and areas to undergo further analysis. There were many comments from the public, as well as input from the Southeast Alaska Regional Advisory Council, which described changes to the economic base of Ketchikan and related employment patterns, the reliance by Ketchikan residents on fish and wildlife resources, and other community characteristics that in the ISC's opinion warrant a further analysis of the Ketchikan Area's nonrural status.

In the case of Prudhoe Bay, the extremely small resident population notwithstanding, the industrial nature of the site and the lack of stores, a school, public services, and little or

no use of fish and wildlife resources typically associated with rural Alaska communities indicate a need for further analysis of its rural status. Inclusion of Prudhoe Bay for further analysis was recommended by the North Slope Regional Advisory Council, to resolve what to local subsistence users has been a contentious and confusing issue regarding the eligibility of Prudhoe Bay workers as Federally qualified subsistence users.

Minority Recommendation

While there is agreement on the inclusion of most of the ten communities and areas that were proposed for analysis, the minority of the ISC recommends that the Board remove Kodiak (#1), Sitka (#2), Saxman (from the Ketchikan Area included in #9), and Deltana (from the grouping described in #10), from the list of communities that will be further analyzed during the review of rural determinations. Along with the majority, the minority also recommends that the communities/areas of Ketchikan (but excluding Saxman; #9) and Prudhoe Bay be added to the review list.

The minority position is consistent with the recommendations provided by the Kodiak/Aleutians, Southeast Alaska, Eastern Interior Alaska, and North Slope Regional Advisory Councils during their fall 2005 meetings, and is also supported by the public testimony heard at these meetings, as well as the majority of public comments that have been received during the comment period.

As stated on page 2, paragraph 2, of the *Decennial Review of Rural Determinations* report dated November 21, 2005, the main focus of this review should be on “what has changed since 1990.” For Kodiak, Sitka, Saxman, and Deltana, the minority of the ISC does not believe that any significant changes to the characteristics of these communities have occurred since the previous determination, to warrant reconsideration of their rural status in the Federal Subsistence Management Program.

The following specific information is offered in support of the minority position, drawing upon public comment and Council recommendations:

SAXMAN

Since its foundation, Saxman has not been economically, socially, and communally integrated with the neighboring community of Ketchikan, but instead has maintained a distinct identity and separate government. Furthermore, Saxman’s 2000 census population of 431 has not substantially changed since the 1990 census, and remains well below the Federal Subsistence Management Program’s 2,500 person rural threshold. The State of Alaska Joint Boards of Fish and Game, in the late 1980s, and the Federal Subsistence Board, in 1990, determined that Saxman was a rural community for the purposes of subsistence regulations. Public comments and Council recommendations provide no evidence that Saxman has assumed a more nonrural character since the Federal Subsistence Management Program’s previous determination of its status.

Saxman's overall wildlife and fish harvest levels, on a per capita basis, are consistent with those of subsistence communities, and show a strong dependency on these harvests (ADF&G Subsistence Division 1988 and 2000 household surveys). Subsistence also forms the basis of its economy. While some residents worked in the timber harvesting, sawmill, and pulp mill industries in the 1980s and 1990s, these operations have closed down. Thus, there are fewer cash employment opportunities for Saxman residents at the present time, who now must rely even more upon subsistence resources to meet their needs.

SITKA

Sitka is an isolated Southeast Alaska island community whose population growth has been minor over the 1990-2000 census time period (only 3%, or 247 persons). The State of Alaska Joint Boards of Fish and Game, in the late 1980s, and the Federal Subsistence Board, in 1990, determined that Sitka was a rural community for the purposes of subsistence regulations. Public comments and Council recommendations provide no evidence that Sitka has assumed a more nonrural character since the Federal Subsistence Management Program's initial determination of its status.

Sitka's geographic isolation contributes to its continued high cost of living, and thus its residents have been dependent on subsistence harvests to meet their needs. Comprehensive household harvest surveys and other studies conducted by ADF&G's Division of Subsistence (1988 and 1997) demonstrate the strong subsistence orientation of Sitka. This data documents patterns that are consistent with other Alaska subsistence communities (high per capita harvest levels, high levels of participation in subsistence harvest and use activities, wide diet breadth, and use of traditional territories). Reliance on these resources has in fact increased, with the recent changes in the community's economy. Logging-related industries have closed, with the subsequent loss of hundreds of well-paying jobs. Federal government employment opportunities have also declined, due to the reduction of personnel required to manage timber harvest on the Tongass National Forest.

KODIAK

Kodiak is an isolated island community located within the Gulf of Alaska. Although small population increases (5%, or 625 people) have occurred in the overall Kodiak area, including areas such as Monashka Bay, Women's Bay, and other areas along the road system, the number of residents in Kodiak City actually declined (by 31 persons) between the 1990 and 2000 census. A large proportion of the area's population (nearly 3,000 people) is comprised of temporary residents associated with the U.S. Coast Guard base. The Board has determined that Kodiak is a rural community for the purposes of subsistence regulations, and public comments and Council recommendations set forth no

evidence that Kodiak has assumed a more nonrural character since this status was assigned.

Because of its geographic isolation, Kodiak has one of the highest cost of living rates in the U.S., and its residents continue to be dependent on the subsistence harvests of fish and wildlife to meet their needs. Levels of per capita harvest, participation in subsistence harvest and use activities, wide diet breadth, and use of traditional areas documented in ADF&G Subsistence Division surveys demonstrate this reliance. Declines in economic opportunities in the island's other villages, and the need for elders to move closer to health care facilities, have caused some people to relocate to Kodiak; these residents also continue to engage in subsistence harvesting so as to follow their traditions, and to offset their costly living expenses.

DELTANA

Deltana is currently considered to be a rural community by the Federal Subsistence Management Program. Public comments and Council recommendations set forth no evidence that it has assumed a more nonrural character since the initial determinations were made. Its residents have practiced subsistence traditions and continue to do so in order to meet their needs. Deltana is separate and distinct from the communities of Delta Junction, Big Delta, and the military establishment at Fort Greely and should not be included for further analysis in this grouping.

KETCHIKAN AREA AND PRUDHOE BAY

In contrast to these communities, whose characteristics have not changed in the time period since the Board made its initial determinations, the nonrural Ketchikan City and area (excluding Saxman) have undergone significant changes that warrant further evaluation of their status. In addition, Prudhoe Bay is an industrial enclave established solely for the purposes of oil and gas development and does not have features that would qualify as a "community." The minority therefore agrees with the majority of the ISC that these two places should be included in the upcoming analysis, to reassess their designations in the Federal Subsistence Management Program.

Table 1. Recommendations of the Interagency Staff Committee regarding further analysis of rural/nonrural status of communities and areas in the decennial review of rural determinations.

Community/Area	Interagency Staff Committee Recommendation
Kodiak	Majority: Proceed as proposed with further analysis of rural/nonrural status. Minority: Retain current rural status without further analysis.
Sitka	Majority: Proceed as proposed with further analysis of rural/nonrural status. Minority: Retain current rural status without further analysis.
Adak	Proceed as proposed with further analysis of rural/nonrural status.
Prudhoe Bay	Add to the list of communities for further analysis of rural/nonrural status.
Ketchikan Area	Add to the list of communities for further analysis of rural/nonrural status, with divergent majority and minority recommendations on the preliminary step of evaluating how to group proximal places into the Ketchikan Area (see recommendations regarding grouping evaluations in Table 2).

Table 2. Recommendations of the Interagency Staff Committee regarding further analysis of the grouping of communities and areas in the decennial review of rural determinations. Communities or areas recommended for separation from a nonrural area through further analysis would also be further analyzed as to rural/nonrural status.

Community/Area	Interagency Staff Committee Recommendation
Fairbanks NSB	Proceed as proposed with further analysis of whether to continue using the entire borough as the nonrural area, or separate some outlying areas.
Kenai Area	Proceed as proposed with further analysis of whether to exclude Clam Gulch, and other similarly situated places.
Seward Area	Proceed as proposed with further analysis of whether to exclude Moose Pass, and other similarly situated places.
Wasilla Area	Proceed as proposed with further analysis of whether to include Willow, Point MacKenzie, and other similarly situated places.
Homer Area	Proceed as proposed with further analysis of whether to include Fox River, Happy Valley, and other similarly situated places.
Ketchikan Area	Majority: Proceed as proposed with further analysis of whether to include Saxman, and areas of further growth and development outside of the current nonrural boundary. Minority: Same as majority, except do not include Saxman in the analysis.
Delta Junction Vicinity	Majority: Proceed as proposed with further analysis of whether Delta Junction, Big Delta, Deltana, and Fort Greely should be grouped and their rural/nonrural status evaluated collectively. Minority: Same as majority, except do not include Deltana in the analysis.